



# ARM Group LLC

Engineers and Scientists

May 22, 2020

Ms. Barbara Brown  
Project Coordinator  
Maryland Department of the Environment  
1800 Washington Boulevard  
Baltimore, MD 21230

Re: Comment Response Letter  
& RADWP Addendum  
Area A: Sub-Parcel A8-2  
Tradepoint Atlantic  
Sparrows Point, MD 21219

Dear Ms. Brown:

On behalf of EnviroAnalytics Group, LLC (EAG), ARM Group LLC (ARM) is pleased to provide the enclosed Response and Development Work Plan (RADWP) Addendum for the portion of the Tradepoint Atlantic (TPA) property designated as Area A: Sub-Parcel A8-2 (the Site). ARM is providing these responses to comments received from the Maryland Department of the Environment (MDE) via email on April 14, 2020 regarding the previous submission of the Sub-Parcel A8-2 RADWP (Revision 0 dated March 24, 2020). This Comment Response Letter and the associated RADWP Addendum should be maintained on-site with the RADWP to ensure that the development updates are properly implemented. Responses to the comments are given below; the original comments are included in italics with the responses following.

1. *As with A10-this work plan references a tenant-however, TPA has provided notification that the property will be sold. The RADWP must clearly identify the tasks which will be completed by TPA and by the prospective purchaser. The RADWP must be revised to address issues related to the sale of the property. A detailed construction schedule including when the project will be handed over to the purchaser must be included. Future access rights must be addressed to ensure that TPA will have access rights for future monitoring well installation, monitoring and possibly remediation once the property is transferred.*

As outlined in the RADWP Addendum, institutional controls have been updated to clarify that ground intrusive work will be completed by TPA and the only work to be completed by the property Buyer will be installation of the aboveground trailer and electrical hookup. The ability to access to the Site will be retained by TPA for potential

future monitoring and/or remediation purposes. The proposed implementation schedule, including the time of ownership transfer, has been updated in the Addendum.

2. *A more detailed development plan, other than the general figure 2 must be provided. Please verify whether paving will be extended beyond the existing paving/slab area.*

Updated development plan drawings are provided as **Figure 2** and in **Appendix A** of the A8-2 RADWP Addendum. There will be no paving beyond the existing paving/slab area in the southern portion of the Site (designated as the CCBC Training Area). The existing access road will not be milled/repaved; no additional work is proposed along the road.

3. *Provide additional details on the road proposed for A15.*

The roadway portions on Parcel A15 already exist. The existing access road will not be milled/repaved; no additional work is proposed along the road.

4. *Please note that additional land use restrictions may be required other than those stated. MDE will require that the construction of any future structures other than an elevated office trailer will require additional soil gas testing and/or a vapor barrier due to the detection of VOCs in groundwater.*

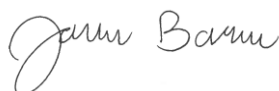
TPA has acknowledged that additional land use restrictions may be required if additional site improvements or construction is required at the Site.

#### **Additional Revisions:**

5. The A8-2 RADWP Addendum proposes modifications to the water and sanitary sewer utility alignments and connection tie-ins from the office trailer. The modified sanitary sewer alignment is located to the north of the main CCBC Training Area. This modification requires reevaluation of the Construction Worker area and the adjusted alignment includes new relevant soil boring locations (A8-018-SB and A8-019-SB). Therefore, revised tables and figures are provided in the Addendum, and reassessment of the Construction Worker SLRA was also required.

If you have any questions, or if we can provide any additional information at this time, please do not hesitate to contact ARM Group LLC at 410-290-7775.

Respectfully submitted,  
ARM Group LLC



Joshua M. Barna, G.I.T.  
Staff Geologist



T. Neil Peters, P.E.  
Senior Vice President

